

JONATHAN A. STIEGLITZ, ESQ.
(SBN 278028)
jonathan.a.stieglitz@gmail.com
THE LAW OFFICES OF
JONATHAN A. STIEGLITZ
11845 W. Olympic Blvd., Suite 750
Los Angeles, California 90064
Telephone: (323) 979-2063
Facsimile: (323) 488-6748

Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
Western Division**

SHAMIKA DENSON

Against

VIRTUOSO SOURCING GROUP,
LLC

Case No.:

COMPLAINT for violations of the Fair
Debt Collection Practices Act, 15 U.S.C.
§ 1692 *et seq.* and the Rosenthal Fair
Debt Collections Practices Act, Cal. Civ.
Code § 1788 *et seq.*

Plaintiff Shamika Denson ("Plaintiff" or "Denson") by and through her
attorneys, The Law Offices of Jonathan A. Stieglitz, as and for its Complaint
against Defendant Virtuoso Sourcing Group, LLC ("Defendant") respectfully sets
forth, complains and alleges, upon information and belief, the following:

JURISDICTION AND VENUE

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C.
§ 1331, as well as 15 U.S.C. § 1692 *et seq.* and 28 U.S.C. § 2201. The Court
also has pendant jurisdiction over the State law claims in this action pursuant
to 28 U.S.C. § 1367(a).

1 7. On information and belief, on a date better known to Defendant,
2 Defendant began collection activities on an alleged consumer debt from the
3 Plaintiff (“Alleged Debt”).
4

5 8. The Alleged Debt was incurred as a financial obligation that was
6 primarily for personal, family or household purposes and is therefore a
7 “debt” as that term is defined by 15 U.S.C. § 1692a(5).
8

9 9. Without waiving that Plaintiff disputes the Alleged Debt, the Alleged
10 Debt had an original creditor of “Sprint,” was a telephone debt incurred for
11 personal purposes and is a consumer debt.
12

13 10. The reporting of a debt to a credit reporting agency by a debt collector
14 is a communication covered by the FDCPA.
15

16 11. Defendant reported the Alleged Debt on the Plaintiff’s credit report.
17

18 12. Plaintiff disputed the Alleged Debt directly with Defendant with a dispute
19 letter on May 30, 2016.
20

21 13. Plaintiff examined her credit report again on August 8, 2016 and found that
22 Defendant had re-reported the Alleged Debt on Plaintiff’s credit report in
23 August of 2016. When Defendant re-reported the Alleged Debt after it had
24 notice of Plaintiff’s dispute, it did not list the account as “disputed by
25 consumer” despite being required to do so by the FDCPA.
26
27
28

1 14. As a result of Defendant's deceptive, misleading and unfair debt collection
2 practices, Plaintiff has been damaged.
3

4
5
6 **FIRST CAUSE OF ACTION**
7 **(Violations of the FDCPA)**

8 15. Plaintiff incorporates by reference all of the above paragraphs of this
9 Complaint as though fully stated herein with the same force and effect as if
10 the same were set forth at length herein.
11

12 16. Defendant's debt collection efforts attempted and/or directed towards
13 Plaintiff violate various provisions of the FDCPA, including but not limited
14 to 15 U.S.C. §§ 1692e, 1692e(2), 1692e(8), 1692e(10) and 1692f.
15

16
17 17. As a result of the Defendant's violations of the FDCPA, Plaintiff has
18 been damaged and is entitled to damages in accordance with the FDCPA.
19

20 **SECOND CAUSE OF ACTION**
21 **(Violations of the RFDCPA)**

22 18. Plaintiff incorporates by reference all of the above paragraphs of this
23 Complaint as though fully stated herein with the same force and effect as if
24 the same were set forth at length herein.
25
26
27
28

1 19. The RFDCPA requires debt collectors to comply with the FDCPA, and
2 a violation of the FDCPA is also a violation of the RFDCPA. Cal. Civ. Code
3 § 1788.17.

4
5 20. The remedies under the FDCPA and RFDCPA are cumulative, and
6 Plaintiff is entitled to damages under both acts.

7
8 21. Upon information and belief, Defendant willfully and knowingly
9 committed the violations of the FDCPA and RFDCPA described herein, and
10 Plaintiff is entitled to statutory damages pursuant to Cal. Civ. Code
11 § 1788.30(b).

12
13
14
15
16 **PRAYER FOR RELIEF**

17 **WHEREFORE**, Plaintiff demands judgment from the Defendants as follows:

18 a) For actual damages provided and pursuant to 15 U.S.C. § 1692k(a)(1)
19 and Cal. Civ. Code § 1788.30(a);

20 b) For statutory damages provided and pursuant to 15 U.S.C.
21 § 1692k(a)(2)(A) and Cal. Civ. Code § 1788.30(b);

22 c) For attorney fees and costs provided and pursuant to 15 U.S.C.
23 § 1692k(a)(3) and Cal. Civ. Code § 1788.30(c);

24 d) A declaration that the Defendant's practices violated the FDCPA and
25 the RFDCPA; and
26
27
28

